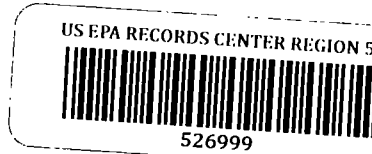




JOHN ENGLER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
CADILLAC DISTRICT OFFICE



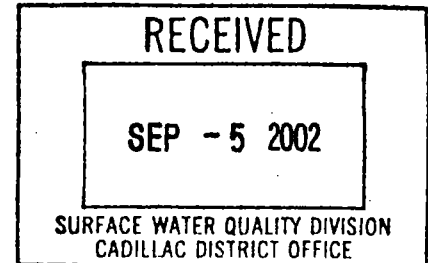
September 5, 2002



RUSSELL J. HARDING
DIRECTOR

Mr. Chris Hubbel
Williamsburg Receiving and Storage
10190 Munro Road
Williamsburg, Michigan 48690

FILE



Dear Mr. Hubbel:

Re: Williamsburg Receiving and Storage, Grand Traverse County
Consent Order #31-07-02

Thank you for the Odor Control Work Plan submitted through Inland Seas Engineering (Inland Seas) for Williamsburg Receiving and Storage (WRS) dated August 26, 2002 (Work Plan). The submittal was required under Section IV (b) (2) of Consent Order number 31-07-02, entered between WRS and the Department of Environmental Quality (DEQ) on August 16, 2002 (Consent Order). The deadline for submittal of the Work Plan under the Consent Order was August 26, 2002. It was received by DEQ staff on August 27, 2002.

Staff of the DEQ conducted a site visit at WRS on August 19, 2002, to observe the efforts outlined in Section IV (b) (1) of the Consent Order. At the time of the inspection, WRS was pumping process wastewater into sealed containers and transporting it off site for disposal and had removed much of the wastewater stored in the lagoon. Although more than five feet of water remained in the lagoon as of August 19, 2002, the level was considerably lower than what was observed in July. At least two aerators were also in operation at that time.

Although progress has been made by WRS in reducing odors, DEQ staff does not agree that odors have been "essentially eliminated" as claimed by Inland Seas. Staff of the DEQ continues to receive odor complaints from residences as much as a mile away from the WRS facility. The most recent complaints indicate that neighbors curtailed Labor Day weekend gatherings, and that families are awakened in the middle of the night due to strong odors.

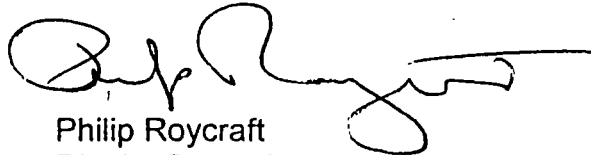
Accordingly, the Work Plan is hereby approved with the following modifications:

1. The tasks outlined in the Work Plan shall be implemented immediately. The Consent Order requires the Work Plan to be implemented if nuisance odors have not been eliminated by August 31, 2002. The Work Plan, as written, suggests it will only be implemented under "unforeseeable circumstances, such as unseasonably hot and dry weather."

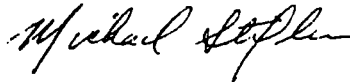
2. Accelerated removal of wastewater (task 1) from the lagoon shall continue. This is consistent with Paragraph 4 (b) (1) of the Consent Order, which requires that water removal from the lagoon continues until the reduced volume, in combination with aeration, eliminates nuisance odor conditions.
3. Addition of lime to the lagoon (task 3) should be initiated as soon as possible.
4. If task 1 is completed to the point that wastewater is removed entirely, sludges and sediments remaining in the lagoon shall be removed and disposed of in accordance with Part 115, Solid Waste Management, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended. If tasks 1 through 3 are unsuccessful, removal of all water and sediment sludges in the lagoon may be necessary. An empty lagoon would not need the temporary liner outlined in Task 5 of the plan, or a third aeration unit.

Thank you for your attention to these matters. If you have any questions, or if you wish to discuss the Work Plan feel free to contact me.

Sincerely,



Philip Roycraft
District Supervisor
Waste Management Division
231-775-3960, Extension 6200



Michael Stifler
District Supervisor
Surface Water Quality Division
231-775-3960, Extension 6260

cc: Mr. Andy Smits, Inland Seas
Mr. Mike Stifler, DEQ-SWQD
Mr. Shane Nixon, DEQ-AQD
Mr. Rick Rusz, DEQ-WMD, Lansing
Ms. Janice Heuer, DEQ-WMD